

**[FILED UNDER SEAL]**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA        )  
    )  
    )  
v.                                    )        CRIMINAL NO. 13-10200-GAO  
    )  
    )  
DZHOKHAR TSARNAEV        )

**SUPPLEMENT TO MOTION FOR ORDERS TO THE  
MASASACHUSETTS STATE POLICE, MIDDLESEX DISTRICT  
ATTORNEY'S OFFICE, AND WALTHAM POLICE DEPARTMENT  
TO PRODUCE FOR *IN CAMERA* REVIEW MATERIAL  
REGARDING TAMERLAN TSARNAEV'S INVOLVEMENT  
IN 2011 WALTHAM MURDERS**

Defendant, Dzhokhar Tsarnaev, respectfully submits this supplement to his previously filed Motion for Orders to the Massachusetts State Police, the Waltham Police Department, and the Middlesex County District Attorney's Office to produce for *in camera* review information regarding Tamerlan Tsarnav's involvement in a triple murder in Waltham on September 11, 2011.

After undersigned counsel filed this motion *ex parte*, the Court ordered that the government be served with the motion. Since that time, the government has produced in discovery a report of an interview with Khairullozhon Matanov, conducted on April 23, 2015. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The government has consistently taken the position that information regarding the homicides are in the possession of state law enforcement agencies, who have not shared that information with federal agents or the prosecutors. Tr. 4/13/15 at 16. [REDACTED]

[REDACTED]

This Court has held that the defense cannot present evidence about the Waltham murders because it has not provided sufficient information to show that Tamerlan participated in them. [REDACTED]

[REDACTED]

Undersigned counsel therefore seek to supplement their motion and, in addition, to compel the government to provide to the defense or, in the alternative, to the Court for *in camera* review, any information regarding Tamerlan Tsarnaev's involvement in the September 11, 2011 homicides.

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By his attorneys



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**Certificate of Service**

I hereby certify that this document is being served upon counsel for the United States by e-mail PDF on April 27, 2015.

